

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____	:	
RHONDA HALL,	:	
	:	
Plaintiff,	:	
	:	
V.	:	Civil Action No. 3:05-cv-30002-MAP
	:	
VERIZON COMMUNICATIONS, INC.,	:	
and VERIZON NEW ENGLAND, INC.	:	
	:	
Defendants.	:	
_____	:	

MOTION TO EXCEED PAGE LIMIT
ON LEGAL MEMORANDUM

The Plaintiff respectfully moves this Court for leave to file a legal Memorandum in opposition to the Defendant's Motion *In Limine* to Exclude Evidence of Carew Street Graffiti which exceeds the twenty (20) page limit specified in Local Rule 7.1(B)(4). As grounds for this motion, Plaintiff states:

1. The Defendants have filed a motion *in limine* to exclude evidence which is very important to the plaintiff's case, and requires a full and comprehensive response.
2. The plaintiff's opposition to the defendants' pending motion is extremely fact intensive, and the Factual Background portion of the Memorandum of Law consumes eleven pages alone. Similarly, the blending of the relevant facts and applicable law in the body of the Memorandum is a lengthy endeavor.

3. There are multiple legal grounds supporting the relevance and admissibility of the evidence which the defendants seek to exclude, and the additional pages of legal argument in the Memorandum is necessary in order to fully respond to the issues raised in the pending motion. a

Respectfully submitted,
PLAINTIFF RHONDA HALL
By her Attorney,

Dated: May 22, 2007

/s/ Hugh D. Heisler
Hugh D. Heisler
BBO # 563925
Heisler, Feldman, McCormick &
Garrow, P.C.
1145 Main Street, Suite 508
Springfield, MA 01103
(413) 788-7988

CERTIFICATE OF SERVICE

I, Hugh D. Heisler, hereby certify that a true copy of the foregoing Motion was served electronically upon the attorney of record for the Defendants on May 22, 2007.

/s/ Hugh D. Heisler
Hugh D. Heisler